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Creditors of IN Holdings, Inc. and IN Holdings
Canada, Inc. and Co-Plan Proponents

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10 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SAN FERNANDO VALLEY DIVISION**

11 In re
12 IN Holdings, Inc. *et al.*,
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14 Debtors and Debtors
in Possession.
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Case No. 1:24-bk-11323-VK

Chapter 11

(Jointly Administered with: Case No. 1:24-bk-
11324-VK, Case No. 1:24-bk-11325, and Case
No. 1:24-bk-11326-VK)

- 16 Affects IN Holdings, Inc.
17 Affects IN Holdings Canada, Inc.
18 Affects 5310 Holdings, LLC
19 Affects DAI US HoldCo Inc.
20 Affects All Debtors

16 **DECLARATION OF JERIAD R. PAUL (1)**
WITH BALLOT TALLY AND (2) IN
SUPPORT OF CONFIRMATION OF
DEBTORS' AND COMMITTEE'S JOINT
CHAPTER PLAN OF REORGANIZATION

21 **Hearing:**

Date: November 20, 2025
Time: 10:00 a.m.
Place: Courtroom 301

I, Jeriad R. Paul, make this declaration (the “Declaration”) pursuant to 28 U.S.C.

§ 1746, and state:

1. I am a Vice President of Omni Agent Solutions, Inc. (“Omni”), a chapter 11 administrative services firm, whose offices are located in 5955 De Soto Ave., Suite 100, Woodland Hills, California, 91367 and 1120 Avenue of the Americas, 4th Floor, New York, NY 11036. Omni is the noticing agent appointed in the bankruptcy cases of IN Holdings, Inc. and its related debtor entities (collectively, the “Debtors”). I am over the age of 18 years and not a party to the above-captioned action. I am duly authorized to submit this declaration on behalf of Omni.

2. I submit this declaration in support of the confirmation of the *Debtors' and Committee's Joint Chapter 11 Plan of Reorganization* Dated October 1, 2025 [Docket No. 837] (as may be amended or modified, the "Plan" or "Disclosure Statement" as the context requires).¹

3. I have personal knowledge of the matters set forth herein based on my own activity and observation or based on information provided by persons acting at my direction. If called and sworn as a witness, I could, and would, testify competently to the matters set forth herein.

BACKGROUND AND FOUNDATION

4. On October 08, 2024, the Debtors filed the *Order Approving Debtors' Application for Entry of an Order Authorizing the Retention and Appointment of Omni Agent Solutions, Inc. As Administrative Agent Pursuant To 11 U.S.C. §§ 327(A) and 328 Effective as of August 23, 2024*. [Docket No. 134].

5. This declaration is submitted in partial satisfaction of this Court's *Order*: *(I) Approving The Joint Disclosure Statement Describing Debtors' and Committee's Joint Chapter 11 Plan of Reorganization; (II) Approving the Form of Ballots and Proposed Solicitation and Tabulation Procedures; (III) Fixing the Voting Deadline with Respect to The Joint Chapter 11 Plan; (IV) Fixing the Last Date for Filing Objections to The Joint Chapter 11 Plan; And (V) Scheduling a Hearing to Consider Confirmation of the Joint Chapter 11 Plan* [Docket No 840] (The "Balloting Order").

¹ Capitalized terms used but not defined herein shall have the definitions contained in the Plan. All statutory references are to the Bankruptcy Code unless otherwise indicated.

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2 **SERVICE OF PLAN AND SOLICITATION MATERIALS**

3 6. As required by paragraph 5 of the Balloting Order, on October 31, 2025, Omni filed
4 its *Certificate of Service* [Docket No. 872], which describes in detail the documents that were served
5 by Omni on October 3 and demonstrates compliance with paragraph 1 of the Balloting Order.

6 **BANKRUPTCY LOCAL RULE 3020-1 STATEMENTS**

7 7. Unimpaired Classes (B.L.R. 3020-1(a)). Classes 1, 6, 8, and 9 are identified in the
8 Plan as unimpaired:

9 a. According to the Plan, notwithstanding, if it is determined that
10 EWB is owed any additional amount (other than unasserted contingent
11 indemnification obligations and/or unasserted expense reimbursement
12 obligations), the Plan provides that such claim will be paid in full by the
13 Reorganized Debtors within three (3) business days of the date that EWB submits
14 an accounting and invoice to the Debtors or on the Effective Date in an amount
15 determined by the Bankruptcy Court.

16 b. According to the Plan, Holders of Allowed Class 6 Interests shall
17 retain their respective interests.

18 c. According to the Plan, Holders of Allowed Class 8 Interests shall
19 remain the same.

20 d. According to the Plan, Holders of Allowed Class 9 Interests shall
21 remain the same.

22 8. Ballot Tabulation (B.L.R. 3020-1(a)). I have worked with the Omni team to collect
23 and tabulate ballots received for all impaired, voting classes under the Plan.

24 a. Class 2 – Wage Related Claims: Class 2 accepted the Plan with 100% of all
25 Ballots received indicating acceptance. A detailed summary of the Ballots cast in Class 2 is
26 attached hereto as Exhibit A.

27 b. Class 3 – General Unsecured Claims [Excluding Insider Claims]: Class 3
28 accepted the Plan with 100% of all Ballots received indicating acceptance. A detailed

1 summary of the Ballots cast in Class 3 is attached hereto as Exhibit B.

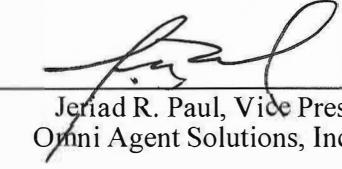
2 c. Class 4 – General Unsecured Claim of Insider Klee Irwin: Class 4 accepted
3 the Plan with 100% of all Ballots received indicating acceptance. A detailed summary of the
4 Ballots cast in Class 4 is attached hereto as Exhibit C.

5 d. Class 5 – General Unsecured Claim of Insider Mark Green: Class 5 rejected
6 the Plan with 100% of all Ballots received indicating rejecting. A detailed summary of the
7 Ballots cast in Class 5 is attached hereto as Exhibit D.

8 e. Class 7 – Irwin Canada - Equity Interest of Public Shareholders: Class 7
9 accepted the Plan with 90.00% of the number of Ballots received, and 97.26% in share
10 amount of Interests represented by the Ballots received, indicating acceptance. Only one
11 Class 7 Ballot was cast against the Plan. A detailed summary of the Ballots cast in Class 7 is
12 attached hereto as Exhibit E.

13 9. Omni did not receive any Ballots that are not identified on one of the aforementioned
14 exhibits. In the event that Omni receives any Ballots after the date hereof, Omni will undertake to
15 advise or cause the Court to be advised.

16 I declare under penalty of perjury that the foregoing is true and correct to the best of my
17 knowledge and belief and that this declaration was executed on November 7, 2025, at 5955 De Soto
18 Ave., Suite 100, Woodland Hills, California, 91367.

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21 Jeriad R. Paul, Vice President
22 Omni Agent Solutions, Inc.
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Exhibit A

Debtor: Irwin Naturals, et al.

Case No. 24-11323

Claims Ballot Detail Results

Class 2 - Wage Related Claims

Class Summary

Voting Outcome: **Accepted**

	Total Received	Total Valid	Accepted	Rejected	Invalid
# Votes:	2	2	2	0	0
Vote %:			100.00%	0.00%	
Amt:		\$5,365.00	\$5,365.00	\$0.00	
Amt %:			100.00%	0.00%	

Creditor	Ballot #	Clm Sch	Date Received	Printed Ballot Amount	Tabulated Vote Amount	Vote	Comment
ALISON MARIE CERVELLI	781	C44	10/27/2025	\$1,240.00	\$1,240.00	Accept	
MARK SALAMON	677	S73	10/28/2025	\$4,125.00	\$4,125.00	Accept	

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Exhibit B

Case No. 24-11323

Claims Ballot Detail Results

Class 3 - General Unsecured Claims [Excluding Insider Claims]

Class Summary

Voting Outcome: **Accepted**

	Total Received	Total Valid	Accepted	Rejected	Invalid
# Votes:	14	13	13	0	1
Vote %:			100.00%	0.00%	
Amt:		\$1,459,472.50	\$1,459,472.50	\$0.00	
Amt %:			100.00%	0.00%	

Creditor	Ballot #	Clm Sch	Date Received	Printed Ballot Amount	Tabulated Vote Amount	Vote	Comment
2DG SOLUTIONS LLC	758	C73	10/10/2025	\$4,517.40	\$4,517.40	Accept	Claimant wrote claim amount of \$4,517.00, tabulated at voting amount.
A360 MEDIA, LLC	695	C6	10/21/2025	\$117,450.00	\$117,450.00	Accept	
AMERICAN EXPRESS NATIONAL BANK	713	C20	10/24/2025	\$83,533.69	\$83,533.69	Accept	
CIRCANA LLC	58	S65	10/21/2025	\$15,870.00	\$15,870.00	Accept	Claimant wrote claim amount of \$355,269.00, tabulated at voting amount.
FELDKAMP MARKETING, INC.	749	C65	10/21/2025	\$15,496.09	\$15,496.09	Accept	
JK SALES	108	S124	10/18/2025	\$2,460.30	\$0.00	Invalid	Vote not indicated.
JOHNSON & BERTRAM LLP	693	C3	10/7/2025	\$5,531.24	\$5,531.24	Accept	
KARLED ENTERPRISES I	811	C49	10/31/2025	\$1.00	\$1,020,910.00	Accept	
MARK JUDKINS CONSULTING COMPANY	810	C46	10/31/2025	\$7,498.00	\$7,498.00	Accept	
NU-BORN EXPRESS, INC	720	C25	10/9/2025	\$28,684.47	\$28,684.47	Accept	
OMEGA SALES	112	S129	10/17/2025	\$3,068.83	\$3,068.83	Accept	Claimant wrote claim amount of \$5,447.28, tabulated at voting amount.
PARAGON LABORATORIES	716	C21	10/31/2025	\$62,671.40	\$62,671.40	Accept	Claimant wrote claim amount of \$171,404.35, tabulated at voting amount.
STACI AMERICAS LLC	818	C60	10/29/2025	\$1.00	\$1.00	Accept	Claimant wrote claim amount of \$135,230.88, tabulated at voting amount.
ZAPP PACKAGING INC	99	S114	10/31/2025	\$94,240.38	\$94,240.38	Accept	Claimant wrote claim amount of \$94,240.00, tabulated at voting amount.

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Exhibit C

Debtor: Irwin Naturals, et al.

Case No. 24-11323

Claims Ballot Detail Results

Class 4 - General Unsecured Claim of Insider Klee Irwin

Class Summary

Voting Outcome: **Accepted**

	Total Received	Total Valid	Accepted	Rejected	Invalid
# Votes:	1	1	1	0	0
Vote %:			100.00%	0.00%	
Amt:		\$1,035,682.49	\$1,035,682.49	\$0.00	
Amt %:			100.00%	0.00%	

Creditor	Ballot #	Clm Sch	Date Received	Printed Ballot Amount	Tabulated Vote Amount	Vote	Comment
KLEE IRWIN	786	C64	11/3/2025	\$1,035,682.49	\$1,035,682.49	Accept	Claimant wrote claim amount of \$1,035,682.459, tabulated at voting amount.

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Exhibit D

Debtor: Irwin Naturals, et al.

Case No. 24-11323

Claims Ballot Detail Results

Class 5 - General Unsecured Claim of Insider Mark Green

Class Summary

Voting Outcome: **Rejected**

	Total Received	Total Valid	Accepted	Rejected	Invalid
# Votes:	1	1	0	1	0
Vote %:			0.00%	100.00%	
Amt:		\$1,000,000.00	\$0.00	\$1,000,000.00	
Amt %:			0.00%	100.00%	

Creditor	Ballot #	Clm Sch	Date Received	Printed Ballot Amount	Tabulated Vote Amount	Vote	Comment
MARK GREEN	787	C81	10/27/2025	\$1,000,000.00	\$1,000,000.00	Reject	

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Exhibit E

Case No. 24-11323

Claims Ballot Detail Results

Class 7 - Irwin Canada - Equity Interest of Public Shareholders

Class Summary

Voting Outcome: **Accepted**

	Total Received	Total Valid	Accepted	Rejected	Invalid
# Votes:	10	10	9	1	0
Vote %:			90.00%	10.00%	
Share Amt:		778,874	757,541	21,333	
Share Amt %:			97.26%	2.74%	

Creditor	Ballot #	Clm Sch	Date Received	Printed Ballot	Tabulated Vote	Vote	Opt In Elect	Comment
DAVID RIESCO	390	S478	10/28/2025	14,933	14,933	Accept	<input checked="" type="checkbox"/>	Shares.
DENNIS DIAZ	436	S524	10/8/2025	235,556	235,556	Accept	<input checked="" type="checkbox"/>	Shares.
IRYNA OBLASOVA	400	S488	10/28/2025	133	133	Accept	<input checked="" type="checkbox"/>	Shares.
JASON WIGLEY	372	S460	10/30/2025	21,333	21,333	Accept	<input checked="" type="checkbox"/>	Shares.
JAVIER LOPEZ	416	S504	10/25/2025	21,333	21,333	Reject	<input checked="" type="checkbox"/>	Shares.
MARIO QUINTERO	329	S417	10/14/2025	14,208	14,208	Accept	<input checked="" type="checkbox"/>	Shares.
MIGUEL N TOMAS	389	S477	10/11/2025	235,556	235,556	Accept	<input checked="" type="checkbox"/>	Shares.
MIR HUKULAK	402	S490	10/28/2025	133	133	Accept	<input checked="" type="checkbox"/>	Shares.
RAUL CRUZ	383	S471	10/22/2025	235,556	235,556	Accept	<input checked="" type="checkbox"/>	Shares.
YANA YANA OBLASOVA	401	S489	10/28/2025	133	133	Accept	<input checked="" type="checkbox"/>	Shares.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
21650 Oxnard Street, Suite 500, Woodland Hills, CA 91367.

A true and correct copy of the document(s) entitled: **DECLARATION OF JERIAD R. PAUL (1) WITH BALLOT TALLY AND (2) IN SUPPORT OF CONFIRMATION OF DEBTORS' AND COMMITTEE'S JOINT CHAPTER PLAN OF REORGANIZATION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the document(s) were served by the court via NEF and hyperlink to the document. On **November 10, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **November 10, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE KAUFMAN WAIVES SERVICE OF JUDGE'S COPIES FOR DOCUMENTS THAT ARE 25 PAGES OR LESS.

Honorable Victoria S. Kaufman
United States Bankruptcy Court
Central District of California
21041 Burbank Boulevard, Suite 354 / Courtroom 301
Woodland Hills, CA 91367

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, **2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 10, 2025

Date

JENNIFER WARNER

Printed Name

/s/ Jennifer Warner

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- **Kyra E Andrassy** kandrassy@raineslaw.com, bclark@raineslaw.com;csantiago@raineslaw.com
- **Jessica L Bagdanov** jbagdanov@bg.law, ecf@bg.law
- **Ryan W Beall** rbeall@googleapis.com, kadele@googleapis.com; dfitzgerald@googleapis.com; rbeall@ecf.courtdrive.com; cmeeke@googleapis.com
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